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Remarks

Applicant has amended the claims and the specification to overcome the Examiner's formal objections. Claim 27 has been further amended to eliminate a typographical error.

On the merits, the Examiner has rejected all independent claims based on anticipation or obviousness in light of the Jones et al. patent, and rejected dependent claims based on Jones et al. in combination with other documents. Applicant respectfully submits this rejection is in error.

The presently claimed invention relates to a novel method for providing voice over IP service to a location that is served by an internet connection and analog telephone service, in a way that need not require that location to also have a voice gateway for converting between analog and IP telephony.

Specifically, each claim recites a "call forwarding manager" that achieves two important functions. First, it has the ability to communicate over digital networks to generate a "request for service" such as to trigger action by a voice gateway, and second, it has analog telephony capabilities enabling it to "receiv[e] an analog telephone call" (claims 1 and 13) or collect data from an analog telephone call such as DNIS or ANI (claim 25). This combination allows the "call forwarding manager" to receive calls in the same manner as any analog

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telephone system, and then trigger activity to transfer or "forward" the call to allow a separate device, the "voice gateway" to convert the call from analog telephony to IP telephony.

Because the "call forwarding manager" can forward out a received call to a remote voice gateway, it allows an organization to use IP telephony without necessarily having a local voice gateway, a substantial savings and opening up substantial new opportunities for IP telephony.

Thus, uniquely, as recited in claims 1 and 13, "analog telephone call" that is "receiv[ed] ... at [the] call forwarding manager", can be "connect[ed] via [a] voice gateway to [an] Internet protocol telephone", that is, an analog telephone call is moved from an original recipient device (the call manager) to a different recipient device (the voice gateway) to enable it to be handled by an IP telephone.

While this functionality is unique, the "call forwarding manager" is *per se* unique in function, because, as recited in claim 25, it has an analog telephone connection where it captures one or both of DNIS and ANI from an analog telephone call, and also has a digital connection from which it generates requests with one or both of the DNIS and ANI.

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For the purpose of illustration, consider the following example. A catalog mail order company has only ONE 1-800 analog telephone line, but has hundreds or thousands of customer service personnel waiting to take phone orders, each on his/her own Internet Protocol telephone. The catalog mail order company has only one paid trunk line instead of hundreds of trunk lines to allow inbound calls to each customer service person. That ONE 1-800 analog telephone and one paid trunk line connects to a call forwarding manager (CFM) box at the catalog mail order company. When a customer call comes in to the 1-800 number, the CFM generates a request to forward the current call to the voice gateway, for completion to any one of the Internet Protocol telephones. The CFM could even request to forward the call to a designated Internet Protocol telephone based on a predetermined configuration setup or DNIS information.

The Jones et al. patent relied upon by the Examiner describes an analog telephone with a device aiding the analog telephone to make or receive call over the public switched telephone network (PSTN) or voice over IP (VoIP). Jones' system detects whether an incoming call is from the PSTN or VoIP, assertedly based on a unique ring tone, or a call waiting tone generated if the user is on a call. Jones also claims that the device aiding the analog telephone can detect a predetermined

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signal coming from the analog telephone indicating that it is an analog telephone trying to make an out going call using the PSTN or VoIP.

Jones' device that aids the analog telephone is nothing like the claimed call forwarding manager. Jones' device is an analog adapter (analog to VoIP converter); it converts an analog telephone call to VoIP. This is not the function presently claimed. The present claims 1 and 13 recite a function not accomplished by the Jones adapter, namely, receiving an analog call, and generating requests for service to a separate voice gateway that itself manages conversion between analog and VoIP standards. Nothing in Jones suggests such a function. Furthermore, the present claim 25 recites the ability to receive DNIS or ANI information from an analog telephone call, and deliver a request including one or both. Nothing in Jones suggests such a function.

In short, nothing in Jones relates to forwarding or transferring incoming calls between their original termination point and a different termination point, for any reason much less for the reason of converting between analog and IP telephony, and nothing in Jones describes a device that would facilitate such a function.

The Examiner's rejections for obviousness are each premised upon the Examiner's assertions of anticipation by Jones.

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* As Jones is not in anticipation of the present claims, each of these rejections must fail. Applicant disagrees strongly with both the application and interpretation of each other item of prior art relied upon, but for the purposes of brevity those disagreements need not be elaborated here.

Applicant submits in light of the foregoing that all claims are allowable and earnestly requests issuance of a Notice of Allowability.

A petition for three-month extension of time is included on the transmittal of this response. If, however, any petition for extension of time is necessary to accompany this communication, please consider this paper a petition for such an extension of time, and apply the appropriate extension of time fee to Deposit Account 23-3000. If any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23-3000.

Respectfully submitted,



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